

ARIEL E. STERN, ESQ.  
Nevada Bar No. 8276  
JAMIE K. COMBS, ESQ.  
Nevada Bar No. 13088  
AKERMAN LLP  
1635 Village Center Circle, Suite 200  
Las Vegas, NV 89134  
Telephone: (702) 634-5000  
Facsimile: (702) 380-8572  
Email: ariel.stern@akerman.com  
Email: jamie.combs@akerman.com

*Attorneys for BMW Financial Services NA, LLC*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CLAYTON R. FREEMAN,

Plaintiff,

v.

BMW FINANCIAL SERVICES NA, LLC;  
EQUIFAX INFORMATION SERVICES, LLC;  
EXPERIAN INFORMATION SOLUTIONS,  
INC.,

Defendants.

Case No. 2:20-cv-01355-JCM-BNW

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO RESPOND TO  
COMPLAINT**

**(FIRST REQUEST)**

Clayton R. Freeman (**Freeman**) and BMW Financial Services NA, LLC (**BMW**), hereby stipulate and agree that BMW shall have an additional seven (7) days, up to and including **September 25, 2020**, to file its response to the plaintiff's complaint, which is currently due on September 18, 2020. The complaint was filed on July 22, 2020.

Good cause exists to grant the requested extension. BMW requested the extension from Freeman so that the parties could explore settlement options.

...

...

...

...

...

This is the parties' first request for an extension of this deadline, and is not intended to cause any delay or prejudice to any party.

DATED this 18th day of September, 2020.

<b>AKERMAN LLP</b>	<b>KIND LAW</b>
<u>/s/ Jamie K. Combs</u>	<u>/s/ Michael Kind</u>
ARIEL E. STERN, ESQ.	MICHAEL KIND, ESQ.
Nevada Bar No. 8276	Nevada Bar No. 13903
JAMIE K. COMBS, ESQ.	8860 S. Maryland Parkway, Suite 106
Nevada Bar No. 13088	Las Vegas, NV 89123
1635 Village Center Circle, Suite 200	<i>Attorney for Clayton R. Freeman</i>
Las Vegas, NV 89134	
<i>Attorneys for BMW Financial Services NA, LLC</i>	

**IT IS SO ORDERED.**

**UNITED STATES DISTRICT COURT JUDGE**

**DATED:** September 22, 2020

**AKERMAN LLP**

1635 VILLAGE CENTER CIRCLE, SUITE 200  
LAS VEGAS, NEVADA 89134  
TEL.: (702) 634-5000 – FAX: (702) 380-8572